

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SEVENTH GENERATION, INC.,
Movant,

v.

GENERATION GOOD, N.F.P.,
Respondent.

CASE NO. 1:17-mc-00333

CASE PENDING IN NORTHERN
DISTRICT OF ILLINOIS:
No. 1:16-cv-9358

**MEMORANDUM OF LAW IN SUPPORT OF SEVENTH GENERATION, INC'S
MOTION TO TRANSFER TO THE NORTHERN DISTRICT
OF ILLINOIS ITS MOTION TO QUASH AND/OR MODIFY
SUBPOENA SERVED BY RESPONDENT ON SOCIAL MEDIA LINK, LLC**

Movant, and Defendant in the underlying action, Seventh Generation, Inc. ("Seventh Generation"), pursuant to Federal Rule of Civil Procedure 45(f), submits this Memorandum of Law in Support of its Motion to Transfer to the Northern District of Illinois its Motion to Quash and/or Modify Subpoena Served by Respondent on Social Media Link, LLC.

Rule 45(f) allows a "court where compliance is required" to transfer a motion relating to a subpoena to the "issuing court if the person subject to the subpoena consents or if the court finds exceptional circumstances." Fed. R. Civ. P. 45(f). As explained in the Declaration of Karen Tyler (the "Tyler Declaration") attached to Seventh Generation's Motion to Quash and/or Modify Subpoena, counsel for subpoenaed party Social Media Link LLC in this matter has consented to transfer of Seventh Generation's Motion to Quash and/or Modify that subpoena – filed concurrently with this Motion – to the Northern District of Illinois, where the subpoena was issued. Tyler Declaration ¶ 3.

Moreover, transfer is also appropriate because the information requests to which Seventh Generation objects have also been issued directly to Seventh Generation in discovery in the

underlying case, and Seventh Generation's objections to production of the information – either by itself, or by Social Media Link LLC, its subpoenaed contractor – are largely the same. Therefore, it would serve interests of judicial economy for the Northern District of Illinois to decide on the validity of those objections in the context of discovery in the underlying action and the present Motion to Quash simultaneously.

Conclusion

For the foregoing reasons, Seventh Generation respectfully requests that the Court grant its Motion and transfer this matter to the Northern District of Illinois pursuant to Federal Rule of Civil Procedure 45(f).

Dated: September 7, 2017

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